

Exhibit K

**Defendant's Amended Answers to Select Requests for
Admission**

copy of the genuine original. The defendant has been unable to locate the subject e-mails despite a search of its files and systems.

73

5/13/2006 email re: Sexual Harassment Workshop

ANSWER: After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny that Exhibit 73 is a true copy of the genuine original. The defendant has been unable to locate the subject e-mails despite a search of its files and systems.

94

8/12/2007 letter from Lewandowski to Griffin

ANSWER: The defendant admits that the exhibit is a true copy of the document maintained in its files.

110

10/17/2007 Ratliff email re: Announcement

ANSWER: The defendant admits that the exhibit is a true copy of the e-mail located within the defendant's computer system.

111

10/19/2007, 10/24/2007 emails re: personal items

ANSWER: The defendant admits that the exhibit is a true copy of the e-mail located within the defendant's computer system.

115

10/19/2007 emails re: Cobra paid by Columbia College

ANSWER: After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny that Exhibit 115 is a true copy of the genuine original. The defendant has been unable to locate the subject e-mails despite a search of its files and systems

123

10/3/2008 notice of termination of Group Health coverage

ANSWER: The defendant admits that the exhibit is a true copy of the genuine original.

130

1/30/2008 Course and Fee Statement for Lisa Lewandowski

ANSWER: The defendant admits that the plaintiff was enrolled in courses during the semester reflected in the exhibit and admits that the plaintiff was enrolled in the courses identified in the exhibit but denies that the exhibit is a true copy of the accurate tuition amount.

132

tuition records for Lisa Lewandowski

ANSWER: The defendant admits that the exhibit is an accurate copy of statements up to February 22, 2007. After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny that the exhibit's last page and its statement of amounts due is a true copy of the genuine original.

133

7/24/2007 letter re: Assistant to the Dean position

ANSWER: The defendant admits that the exhibit is a true copy of the e-mail sent to Eliza Nichols.

7. When Ms. Lewandowski complained of Dean Lehrer's sexual harassment of her, Ms. Lewandowski was enrolled as a student at defendant.

ANSWER: Objection. The request is vague with regard to the term "complained" and does not state when the alleged complaint was made. Without waiving its objection, the defendant admits that Lisa Lewandowski was enrolled as a student at Columbia College Chicago on Oct. 11, 2006.

23. Around 10/21/06, Dean Lehrer apologized to Ms. Lewandowski for his inappropriate behavior on 10/10/2006, 10/11/2006, and 10/12/2006.

ANSWER: After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny the allegations of paragraph 23. Leonard Lehrer has no recollection of the alleged apology referenced in paragraph 23.

39. Leonard Lehrer told Ms. Lewandowski not to e-mail him directly because he had told his wife about some of the October 2006 incidents with Ms. Lewandowski and that, as a result, his wife did not want to see emails from Ms. Lewandowski.

ANSWER: After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny the allegations of paragraph 39. Leonard Lehrer does not recall telling Lisa Lewandowski not to email him directly as is referenced in paragraph 39.

40. Leonard Lehrer signed his wife's name to the card accompanying the gift to Ms. Lewandowski of "Anna's Song."

ANSWER: After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny the allegations of paragraph 40. Leonard Lehrer does not recall signing his wife's name as alleged in paragraph 40.

41. "Anna's Song" is a collection of Leonard Lehrer's daughter's poetry.

ANSWER: The defendant admits the allegations of paragraph 41.

72. Leonard Lehrer was scheduled to attend a 2006 sexual harassment training.

ANSWER: After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny the allegations of paragraph 72. Leonard Lehrer does not recall whether he was scheduled to attend a 2006 sexual harassment training and, despite a search of its records, the defendant is unable to admit or deny the allegations of paragraph 72.

74. Leonard Lehrer was scheduled to attend a 2007 sexual harassment training.

ANSWER: After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny the allegations of paragraph 74. Leonard Lehrer does not recall whether he was scheduled to attend a 2007 sexual harassment training and, despite a search of its records, the defendant is unable to admit or deny the allegations of paragraph 74.

75. Leonard Lehrer did not attend a 2007 sexual harassment training.

ANSWER: After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny the allegations of paragraph 75. Leonard Lehrer does not recall whether he attended a 2007 sexual harassment training and, despite a search of its records, the defendant is unable to admit or deny the allegations of paragraph 75.

76. An appointment entitled "Yahoo" was blocked out on Dean Lehrer's work calendar from 5pm to 8pm on 10/10/06 and 10/11/06.

ANSWER: After reasonable inquiry, the information known by the defendant and readily obtained by it is insufficient to enable the defendant to admit or deny the allegations of paragraph 76. Leonard Lehrer does not recall whether the appointment described in paragraph 76 was blocked out on his calendar and no longer possesses the calendar as referenced in paragraph 76.

97. Debbie Sandlin has filed a lawsuit against defendant for discrimination and retaliation.

ANSWER: The defendant admits that Debbie Sandlin filed a lawsuit against Columbia College Chicago for discrimination and retaliation and denies that the discrimination and retaliation alleged in that lawsuit occurred.

98. Debbie Sandlin is alleging that defendant retaliated against her by taking away her teaching privileges and by firing her after she complained to defendant of discrimination.

ANSWER: The defendant admits that Debbie Sandlin alleges that Columbia College Chicago retaliated against her by taking away her teaching privileges and by firing her after she complained to Columbia of discrimination. The defendant denies that the alleged discrimination and retaliation occurred.

124. On or about 11/30/07, pursuant to Ms. Lewandowski's request to review her personnel file, defendant tendered to Ms. Lewandowski pages 1 through 339 of the personnel file defendant maintained on her and did not, pursuant to that request, tender Ms. Lewandowski any other pages purporting to be from her personnel file.

ANSWER: The defendant admits the allegations of paragraph 124.

125. Pages 1 through 339 of the personnel file that Ms. Lewandowski reviewed on or about 11/30/2007 constituted the entirety of Ms. Lewandowski's personnel file with defendant as of that date.


ANSWER: The defendant admits the allegations of paragraph 125.

126. The 339 labeled pages that defendant produced to Ms. Lewandowski on or about 11/30/2007 did not include the requested leave paperwork or other medical paperwork that Ms. Lewandowski had submitted to defendant for her surgery prior to October 2007.

ANSWER: The defendant denies the allegations of paragraph 126.

Respectfully submitted,

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